

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUNSUB SHIM,

Plaintiff,

-against-

LUXURY ASSET CAPITAL, LLC; NORA
ALETTE GILLERN; CARMICHAEL
GALLERY, LLC; and SETH CARMICHAEL,

Defendants.

Case No. 24-cv-09738-JPC

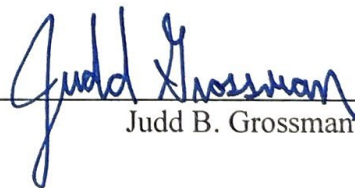
**DECLARATION OF JUDD B. GROSSMAN, ESQ. IN SUPPORT OF
LUXURY ASSET CAPITAL, LLC'S MOTION TO DISMISS**

I, Judd B. Grossman, Esq., an attorney admitted to practice before this Court and the Courts of the State of New York, hereby affirm under penalty of perjury as follows:

1. I am lead counsel to Defendant Luxury Asset Capital, LLC (LAC), and I submit this Declaration in support of its motion to dismiss with prejudice Plaintiff's claims against LAC for conversion (Claim I), replevin (Claim II), and unjust enrichment (Claim III).

2. Attached as Exhibit 1 is a true and correct copy of the February 3, 2022, Loan Contract referenced in Plaintiff's Amended Complaint. (Dkt. 10 ¶ 18; Dkt. 10-1 at Ex. E.)

Dated: May 19, 2025
New York, New York


Judd B. Grossman